

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**IN RE:**

**MICHAEL EUGENE MORELAND  
ROBERTA GAYLE MORELAND,**

**DEBTORS**

**Case No.: BK-16-12210-R  
Chapter 13**

**OBJECTION TO CHAPTER 13 PLAN OF DEBTOR**

Comes now the secured creditor, LoanDepot.com, LLC, by their attorneys, Baer & Timberlake, P.C., and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, LoanDepot.com, LLC would show the Court as follows:

1. LoanDepot.com, LLC is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtor. Said note and mortgage has an estimated outstanding balance of \$121,939.22 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtor reflects an arrearage amount of \$7,981.00. LoanDepot.com, LLC disputes this amount and would propose that the estimated arrearage amount is \$8,631.81.

WHEREFORE, PREMISES CONSIDERED, secured creditor, LoanDepot.com, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief as may be entitled.

LOANDEPOT.COM, LLC,

By: s/ Matthew J. Hudspeth  
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Attorney for Movant

**CERTIFICATE OF SERVICE**

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on January 10, 2017.

Michael Eugene Moreland  
Roberta Gayle Moreland  
HC 62 Box 105  
Nowata, OK 74048-9409

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

Lonnie D. Eck  
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Tulsa, OK 74101

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